IN THE COURT OF COMMON PLEAS OF YORK COUNTY, PENNSYLVANIA

WASHINGTON TOWNSHIP EDUCATION COALITION,

No. 2012-SU-3036-49

Petitioner

CIVIL ACTION - LAW

٧.

DOVER AREA SCHOOL DISTRICT,

Respondent

For Petitioner:

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JOINT STATEMENT OF MATTERS STIPULATED TO, ISSUES AND PROPOSED RESOLUTION OF ISSUES

submitted by Daniel M. Fennick, Esquire, and Stephen S. Russell, Esquire, counsel for the parties

IN THE COURT OF COMMON PLEAS OF YORK COUNTY, PENNSYLVANIA

WASHINGTON TOWNSHIP

No. 2012-SU-3036-49

EDUCATION COALITION,

Petitioner

CIVIL ACTION - LAW

v.

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DOVER AREA SCHOOL DISTRICT,

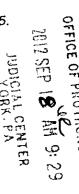
Respondent

JOINT STATEMENT OF MATTERS STIPULATED TO, ISSUES AND PROPOSED RESOLUTION OF ISSUES

NOW COME the parties to this action by and through their respective counsel, Daniel M. Fennick and Stephen S. Russell, attorneys at law, who submit this joint statement as follows:

I. MATTERS STIPULATED TO:

- A. The total population of Washington Township according to the most recent census is 2,673 people.
- B. There are two measures of "taxable inhabitants." The York County tax assessment records show the number of taxable inhabitants as 1,929. The school district's county per capita tax list shows the number of taxable inhabitants as 1,915.
- C. The petition contains 1,406 signatures.



- D. The district believes that 55 signers do not appear on the roles of taxable inhabitants, either on the tax assessment lists or the school district county *per capita* tax list.
- E. Two individuals partially filled out the information requested in the signature form. They did not actually sign their names in the signature block (Joseph Spicer and Linda Hill).
- F. One page of the petition contains two names in the same line (Lawrence Parker and Dorothy Parker). Only one of those individuals actually signed in the signature block.
- G. Regardless of which tax list is used, the district agrees that there are a sufficient number of signatures to satisfy Petitioner's burden under Section 242.1(a).
- H. Paragraphs 1 and 2 of the Petition are admitted.
- I. Washington Township is the municipality at issue in this petition.
- J. Washington Township is contiguous with the Northern York County School District.
- K. Without conceding that the reasons are meritorious, the district agrees that the petition contains reasons for the proposed transfer within the meaning of Section 24 P.S. 2-242.1.

II. <u>ISSUES</u>.

A. <u>Issue</u>: The district questions whether the map of Washington Township (Exhibit A) is a sufficient geographical description of Washington Township as required by Section 24 P.S. Sec. 2-242.1(a).

<u>Proposed Resolution</u>: Petitioners present Exhibit C, which contains a more detailed description.

B. <u>Issue</u>: Has Northern York County School District been given notice of this proceeding?

<u>Proposed Resolution</u>: Northern York County School District was provided with a courtesy copy of the filed Petition, by regular mail, sent on September 12, 2012.

RESPECTFULLY SUBMITTED:

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